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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

MAR 17 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b), ) MM Docket No. 97-239  
Table of Allotments, )  
FM Broadcast Stations. )  
(Otter Creek and Horseshoe )  
Beach, Florida )

TO: John A. Karousos, Chief  
Allocations Branch, Policy and Rules Division  
Mass Media Bureau

COMMENTS OF DICKERSON BROADCASTING, INC.

1. Dickerson Broadcasting, Inc. ("DBI") hereby submits its Comments with respect to the counterproposal tendered by Dixie County Broadcasters ("Dixie") in the above-captioned proceeding. Dixie has proposed the allotment of Channel 240C3 at Horseshoe Beach, Florida.

2. On March 2, 1998, DBI submitted a counter-proposal in MM Docket No. 97-252 in which DBI proposed the allotment of Channel 243C3 at Cross City, Florida. DBI's proposal was not mutually exclusive with the original proposal in the instant proceeding (i.e., the proposal to allot Channel 240A to Otter Creek, Florida). However, DBI's proposal and Dixie's proposal are in conflict because the distance between the proposed sites at Horseshoe Beach and Cross City do not meet the required spacing, as set forth in the accompanying engineering statement.

3. Also as set forth in the engineering statement, though, the Horseshoe Beach and Cross City proposals can both be

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accommodated if a site restriction (described in the engineering statement) is imposed on the Horseshoe Beach allotment. DBI submits that, to the extent that the Commission may prefer an allotment to Horseshoe Beach, that allotment should be made subject to the site restriction so as to permit the Cross City allotment (and related allotments) proposed by DBI in MM Docket No. 97-252. <sup>1/</sup>

Respectfully submitted,

  
/s/ Harry F. Cole  
Harry F. Cole

Bechtel & Cole, Chartered  
1901 L Street, N.W.  
Suite 250  
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(202) 833-4190

Counsel for Dickerson Broadcasting, Inc.

March 17, 1998

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<sup>1/</sup> DBI's counterproposal in MM Docket No. 97-252 contemplates the relocation of Station WDFL(FM), Cross City, to Channel 243C3. As originally proposed by DBI, that change in channel could be accomplished without any physical relocation of the WDFL(FM) transmitter site. If the Horseshoe Beach allotment were to be adopted herein, however, that would no longer be the case, even with the site restriction proposed herein by DBI: the restricted site would still be short-spaced to the current WDFL(FM) transmitter site, even using the spacing provided for in Section 73.215(e). Accordingly, a change in site might be required for Station WDFL(FM), but only if the Commission elects to adopt Dixie's counterproposal in the instant proceeding.

# Radiotechniques

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## Engineering Statement

in support of  
Comments on Counterproposal RM-9237 in  
FCC MM Docket 97-239

Counterproposal to amend Federal Communications Commission  
Rules and Regulations 47CFR § 73.202  
to allocate Channel 240C3  
to Horseshoe Beach, FL

This statement is prepared on  
behalf of Dickerson Broadcasting, Inc.

Dixie County Broadcasters has filed a counterproposal in FCC MM Docket 97-239 to allocate channel 240C3 to Horseshoe Beach, FL in lieu of allocating channel 240A to Otter Creek, FL.

The proposed coordinates of the Horseshoe Beach allocations are in conflict with the allocation of channel 243C3 to Cross City, FL as proposed by Dickerson Broadcasting, Inc. in its counterproposal in FCC MM Docket 97-252. This conflict arises because the distance between the proposed site at Horseshoe Beach and the proposed site at Cross City is only 36.6 km. The required spacing for third adjacent C3 - C3 stations is 43 km in table A of section 73.207(b)(1) of the FCC rules.

The originally proposed allocation in MM Docket 97-239 of channel 240A to Otter Creek, FL has no spacing conflict with the Dickerson Broadcasting, Inc. counterproposal.

If the Horseshoe Beach counterproposal were to be site restricted 17.1 km southeast of the proposed coordinates, there would be no conflict with the Dickerson Broadcasting, Inc. counterproposed allocation site in Docket MM 97-252. Alternative coordinates of N 29° 22' 0" W 083° 8' 0" for Horseshoe Beach are suitable for this site restriction as seen below:

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Comments in MM Docket 97-239  
Dickerson Broadcasting, Inc.

March 1998

MAPFM search of channel 240C3 (95.9 MHz), at N. 29 22 0, W. 83 8 0.  
Searching Channel 240C3 (95.9 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEAR
WXCW	Homosassa Springs	FL	237	A	L	79.4	42.0	132.0°	37.4
WSSR	Clearwater	FL	239	C1	L	165.9	144.0	168.0°	21.9
WSSR	Clearwater	FL	239	C1	L	173.5	144.0	163.3°	29.5
ALC	Valdosta	GA	239	C2	U	142.6	117.0	356.4°	25.6
WQPW	Valdosta	GA	239	C2	L	148.3	117.0	0.9°	31.3
ALC	Otter Creek	FL	240	A	A	28.0	142.0	109.8°	-114.0
ALC	Horseshoe Beach	FL	240	C3	A	17.1	153.0	298.9°	-135.9
ALC	Tallahassee	FL	241	C2	U	144.0	117.0	311.4°	27.0
WEJZ	Jacksonville	FL	241	C	L	178.8	176.0	53.7°	2.8
WGULFM	Dade City	FL	241	A	L	128.4	89.0	140.5°	39.4
WHBX	Tallahassee	FL	241	C2	L	149.0	117.0	312.2°	32.0
ALC	Yankeetown	FL	242	A	U	55.1	42.0	132.6°	13.1
NEW	Yankeetown	FL	242	A	C	56.2	42.0	129.4°	14.2
ALC	Cross City	FL	243	C3	A	42.8	43.0	356.4°	-0.2

The alternative of utilizing the present facilities of WDFL on channel 243C3, as proposed as an alternative in the Dickerson Broadcasting, Inc. would be precluded by allocation of channel 240C3 to Horseshoe Beach, as the present WDFL site is only 26.9 km from the site restricted coordinates, and only 23.9 km from the Dixie County Broadcaster's site. The minimum spacing under section 73.215(e) is 42 km for C3 - C3 third adjacent stations.

Attached is a map, which shows the extent of the 70 db $\mu$ V principal community contour produced by a standard facility C3 station located at the site restricted coordinates. The contour completely encompasses Horseshoe Beach, FL.

# Radiotechniques

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Dickerson Broadcasting, Inc.

March 1998

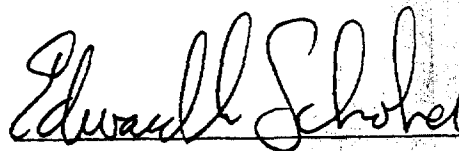
A population study to determine the population within the 60 db $\mu$ V service contour from the original Dixie County Broadcasters proposal found 13,037 persons served by a standard facility C3 station from that site. A similar population study from the alternate coordinates proposed herein serve 19,997 persons, 153% more people served.

## Engineer's Statement

This is to certify that this report has been prepared by myself, or under my direction. It is correct and accurate of my own knowledge, except where stated otherwise, and where this is so, the information is correct to the best of my knowledge and belief.

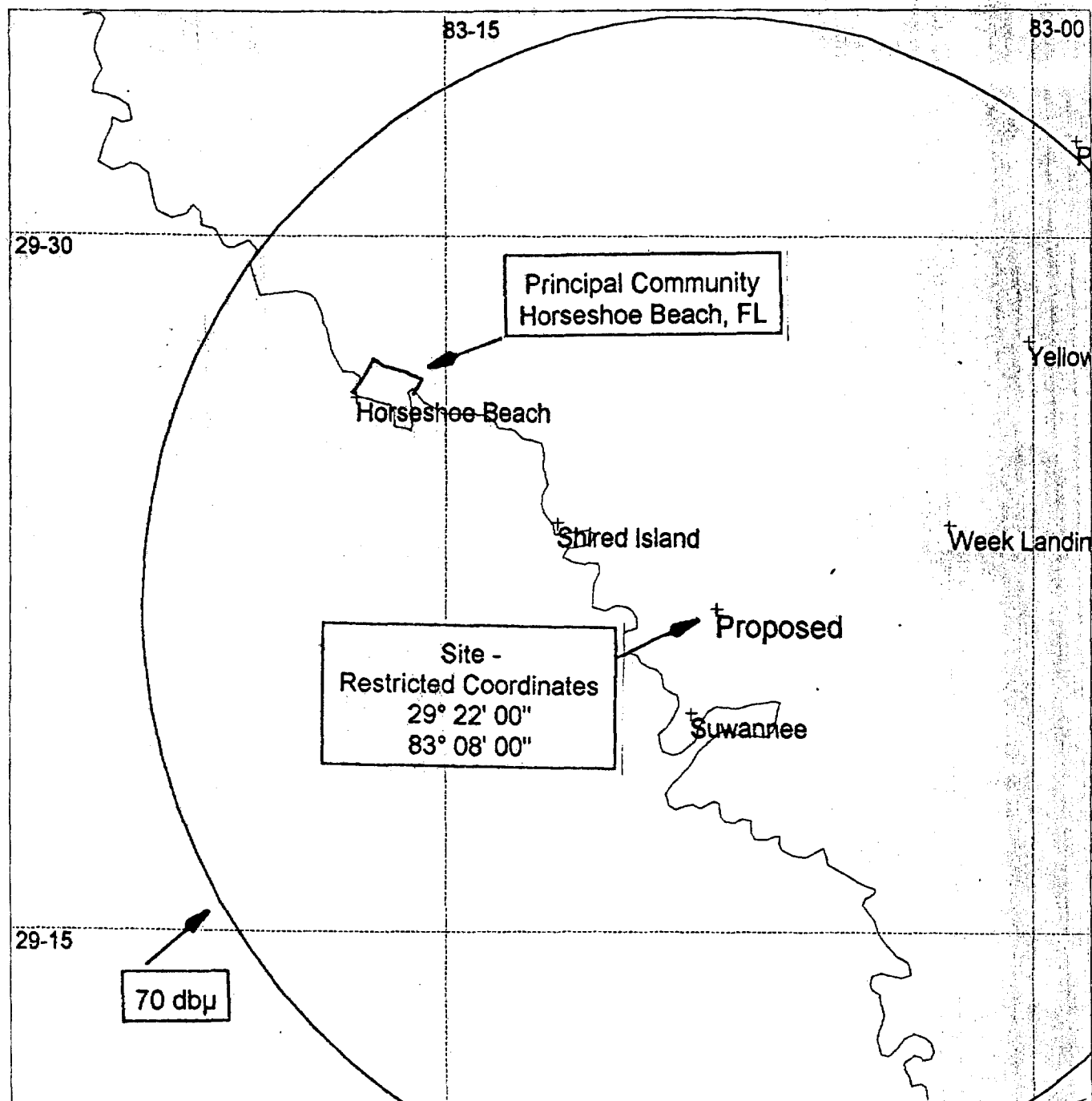
I further certify that I am a Licensed Professional Engineer in the State of New Jersey, and the Commonwealth of Pennsylvania, with a BSEE degree from the Newark College of Engineering of NJIT, and that I am regularly engaged in the practice of radio engineering with the firm of Radiotechniques Engineering Corporation, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, senior member of the IEEE, and SBE, and hold an FCC General Radiotelephone Operator License, and am Certified as a Senior Broadcast Engineer by the SBE. My qualifications are a matter of record with the FCC.

Date: March 17, 1998



Edward A. Schober, PE

(Seal)



Scale 1:250000

5 Km

— FM Service

— State Borders

— Lat-Lon Grids

**Radiotechniques**

Comments on FCC MM Docket 97-239  
Horseshoe Beach, FL 2430C3  
Site Restrictions

**CERTIFICATE OF SERVICE**

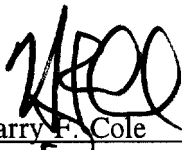
I, Harry F. Cole, hereby certify that on this 17th day of March, 1998, I caused copies of the foregoing "Comments of Dickerson Broadcasting, Inc." to be placed in the U.S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following persons:

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/s/ Harry F. Cole  
Harry F. Cole